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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

**CARLIE SHERMAN, ANNA GOZUN;**  
**AMANDA NASH;** and **JOHN DOE** on behalf  
of themselves and all similarly situated persons,

Plaintiff,

vs.

**TRINITY TEEN SOLUTIONS, INC.,** a  
Wyoming corporation; **TRIANGLE CROSS**  
**RANCH, LLC,** a Wyoming limited liability  
corporation; **MONKS OF THE MOST**  
**BLESSED VIRGIN MARY OF MOUNT**  
**CARMEL, d/b/a MYSTIC MONK**  
**COFFEE,** a Wyoming corporation;  
**GERALD E. SCHNEIDER;**  
**MICHAEELEN P. SCHNEIDER;**  
**ANGELA C. WOODWARD; JERRY D.**  
**WOODWARD; DANIEL SCHNEIDER;**  
**MATHEW SCHNEIDER; MARK**  
**SCHNEIDER; KARA WOODWARD;**  
**KYLE WOODWARD; THOMAS GEORGE;**  
**JUDITH D. JEFFERIS; DALLY-UP, LLC,**  
a Wyoming limited liability corporation;  
**ROCK CREEK RANCH, INC.,** a Delaware  
corporation; **DIOCESE OF CHEYENNE,** a  
Wyoming corporation; and the  
**SOCIETY OF OUR LADY OF THE MOST**  
**HOLY TRINITY,** a Texas corporation; and  
**NEW MOUNT CARMEL FOUNDATION,**  
**INC.,** a Wyoming corporation,

Defendants.

Civil Doc. No. 20-CV-215-SWS

**MOTION TO DISMISS**  
**PLAINTIFFS' CLASS ACTION**  
**COMPLAINT BY DEFENDANTS**  
**TRINITY TEEN SOLUTIONS,**  
**ANGELA WOODWARD, JERRY**  
**WOODWARD, KARA**  
**WOODWARD, AND DALLY-UP,**  
**LLC**

Defendants Trinity Teen Solutions, Angela Woodward, Jerry Woodward, Kyle Woodward, Kara Woodward, and Dally-Up, LLC (TTS, the Woodward, and Dally-Up, LLC), through undersigned counsel and pursuant to FED. R. CIV. P. 12(b)(6), move to dismiss Plaintiffs' Class Action Complaint. In support of this motion TTS, the Woodward, and Dally-Up, LLC submit their Brief in Support of their Motion to Dismiss Class Action Complaint, incorporated here by reference. TTS, the Woodward, and Dally-Up, LLC move for dismissal based on the following grounds:

1. Plaintiffs fail to state knowing violations of the Trafficking Victims Protection Act (TVPA) (Counts 1-3).
2. Plaintiffs fail to state a cognizable labor or services theory pursuant to the TVPA (Counts 1-3).
3. Plaintiffs fail to state the required element of compulsion under the TVPA (Counts 1-3).
4. Plaintiffs fail to state the required element of venture liability under the TVPA (Counts 1-3).
5. Plaintiffs fail to state the required predicate violations pursuant to the Racketeer Influenced and Corrupt Organizations Act (RICO) (Count 4).
6. Plaintiffs cannot establish RICO standing (Count 4).
7. Plaintiffs' RICO claim is untimely (Count 4).
8. Plaintiffs fail to state the remaining substantive RICO elements of (1) conduct (2) of an enterprise (3) through a pattern (4) of racketeering activity. (Count 4).

9. Plaintiffs fail to establish a duty or plausible allegations against Defendant Dally-Up, LLC. (Count 5).

10. Plaintiffs fail to state claims of breach and proximate causation against Defendants TTS and Dally-Up, LLC. (Count 5).

**WHEREFORE** Defendants TTS, the Woodward, and Dally-Up, LLC respectfully request that this Court dismiss the Class Action Complaint.

Respectfully submitted this 19th day of January, 2021.

**GORDON REES SCULLY MANSUKHANI, LLP**

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*Attorneys for Defendants Trinity Teen Solutions,  
Angela Woodward, Jerry Woodward, Kyle  
Woodward, Kara Woodward, and Dally-Up, LLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 19th day of January, 2021, a true and correct image of the foregoing was e-filed via CM/ECF and served to all attorneys of record according to CM/ECF.

/s/ Fran Aragon Eaves

For Gordon Rees Scully Mansukhani, LLP